

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

EXPERIMENTAL "RIDE-ALONG"  
CLASSIFICATION CHANGE FOR PERIODICALS, 1999

Docket No. MC2000-1

MOTION FOR LATE ACCEPTANCE OF AND  
RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS TAUFIQUE TO INTERROGATORIES OF  
COX TARGET MEDIA, INC. AND COX CONSUMER SAMPLING  
(CC/USPS-T1-21-26)

The United States Postal Service hereby provides the responses of witness Taufique to the following interrogatories of Cox Target Media, Inc. and Cox Consumer Sampling: CC/USPS-T1-21-22, filed on November 10, 1999; and CC/USPS-T1-21-22, filed on November 16, 1999. Although interrogatories 21 and 22 were filed on November 10, the material about which they ask was not made available to the Postal Service until November 16. Counsel for Cox indicated that he would not oppose the Postal Service's counting the due date from that time. Counsel also indicated that he would not object to the Postal Service's filing of both of these sets an additional two business days late. The Postal Service does not believe that any other party would be prejudiced by late acceptance of these responses.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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November 30, 1999

  
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Scott L. Reiter

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
INTERROGATORIES OF COX TARGET MEDIA INC. & COX CONSUMER SAMPLING**

**CC/USPS-T1-21.**

Library Reference [CC-LR-1] contains six exhibits. Each exhibit is an enveloped piece with the characteristics listed below. All envelopes have the same dimension, approximately 6 inches high by 9 inches long. Each envelope has a window, and an addressed piece showing through the window as it would if it were mailed at Standard (A) rates, but for purposes of your response to parts a-c of this interrogatory, please assume that the envelopes would meet whatever regulations the Postal Service might prescribe.

Exhibit	Product Samples	Computer Disks	Flat Coupon inserts	Approx. Weight (ounces)
A	0	0	7	1
B	0	0	16	2
C	0	0	25	3
D	1	0	25	3
E	2	0	25	3
F	1	1	16	3

- a. Under the Ride-Along experiment proposed in this docket, please specify for each of the above exhibits whether it could be enclosed within a polybagged magazine as a Ride-Along insert or onsert. Should you need to qualify your answer in one or more respects please do so; e.g., the exhibits could be an onsert to magazines within certain trim sizes, but not otherwise.
- b. For each exhibit which could not qualify as an insert or onsert under the proposed regulations, please specify all reasons why the exhibit does not qualify.
- c. For each exhibit which could not qualify as an insert or onsert under the proposed regulations, please specify what changes would be necessary in order to enable the exhibit to qualify as an onsert.
- d. With respect to the envelopes, what changes, if any, would be required in order for the exhibits to qualify as inserts or onserts under the Ride-Along experiment proposed in this docket.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
INTERROGATORIES OF COX TARGET MEDIA INC. & COX CONSUMER SAMPLING**

**RESPONSE**

- a. Generally, the intent of this filing is to provide a classification change that would allow pieces that are specifically designed to be sent with Periodicals to pay a Periodicals rate and avoid paying for two separate pieces, as is being currently done with Standard (A) enclosures or attachments with periodicals. It is not the intent to shift Standard (A) saturation pieces to "Ride-Along".

It is difficult to evaluate the eligibility of these "Ride-Along" pieces in isolation without the host piece. The Postal Service is concerned about the handling and delivery of the host piece with the "Ride-Along" piece and eligibility could depend on the thickness and rigidity of the host piece itself. But, generally if the host piece is larger than or at least equal to the 9 inches by 6 inches for the envelope, and the "Ride-Along" is inserted or attached so that the uniform thickness criteria are met, then Exhibits A, B & C would most likely qualify for the experimental "Ride-Along" rate. These pieces, as stated in your interrogatory, would be polybagged or attached securely within the periodical. All other proposed requirements for the combined piece would have to be met. See USPS-T-1 generally, and my responses to CC/USPS-T1-3, CC/USPS-T1-4, and CC/USPS-T1-8. Exhibits D, E, and F would most likely not meet the physical requirement of uniform thickness and, therefore, probably would not qualify for the experimental "Ride-Along" rate.

- b. Please note that specific Domestic Mail Manual (DMM) regulations have not yet been formulated. My answers are based only on the general requirements now

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
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contemplated and set forth in my testimony. In all the Exhibits (D, E & F) that most likely would not qualify, product samples cause the piece to become uneven, and therefore, they would not meet the uniform thickness requirement. The CD-ROM as packaged probably would not pose a problem, but larger or thicker packaging could render the piece ineligible for the "Ride-Along" rate.

- c. Taking out the product samples or flattening them, as in your examples in CC-LR-2, would most likely qualify these pieces (Exhibit D, E, & F) for the "Ride-Along" rate.
- d. As long as the envelope has the same or smaller dimensions than the host piece, and is sealed and secured, it would likely not pose a problem. That is assuming that the envelope does not contain items that otherwise affect processing and/or delivery of the piece.

Although the final preparation rules have not yet been determined, it is likely that they would prohibit "Ride-Along" attachments or enclosures from bearing separate address labels.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
INTERROGATORIES OF COX TARGET MEDIA INC. & COX CONSUMER SAMPLING**

**CC/USPS-T1-22**

Assume that the host piece with Ride-Along insert or onsert is a magazine whose thickness exceeds 3/4 inches; i.e., this dimension exceeds the maximum thickness for a flat, and the host piece is therefore classified as a parcel for delivery purposes.

- a. Under the conditions described above, what are the physical requirements and restrictions for the Ride-Along insert or onsert?
- b. Assuming that each of the following product samples weighs no more than 3.3 ounces, please indicate whether each one would or would not qualify as a Ride-Along insert or onsert in a polybagged host magazine that is classified as a parcel for delivery purposes. In the event you cannot answer affirmatively or negatively based on the information provided here, please specify what additional information you would need in order to make a determination.
  - (i) A tube of toothpaste.
  - (ii) A tube of facial cream or hand cream.
  - (iii) A plastic bottle of shampoo.
  - (iv) A roll of toilet tissue.
  - (v) A plastic container of hair spray.
  - (vi) A plastic container of mouthwash
  - (vii) A bar of soap.
  - (viii) A can of potato chips.

**RESPONSE**

- a. The same physical requirements that are discussed in my testimony and interrogatory responses would apply to this piece.
- b. Based on the requirements mentioned in my response to part (a) none of the pieces mentioned in (i) through (viii) would likely qualify for the "Ride-Along" rate.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
INTERROGATORIES OF COX TARGET MEDIA INC. & COX CONSUMER SAMPLING**

**CC/USPS-T1-23.**

- a. What are the current physical requirements for inserts (or onserts) to periodicals that pay the applicable Standard (A) rate of postage? Please provide the relevant DMM reference with respect to each such requirement or restriction.**
- b. In what ways, if any, do the proposed physical requirements and restrictions for inserts (or onserts) at the Ride-Along rate differ from the existing requirements for Periodicals inserts (or onserts) that pay the applicable Standard (A) postage?**
- c. Under the Ride-Along experiment as proposed in this Docket, could an insert (or onsert) whose physical characteristics do not permit it to qualify for the 10-cent Ride-Along rate be mailed as an insert (or onsert) at the applicable Standard (A) rate? Please explain fully any answer that is not an unqualified negative.**

**RESPONSE**

- a. Please see my response to CC/USPS-T1-8 subpart a, where I discussed in detail each of the ways the physical requirements for the proposed classification are more stringent than the requirements for Standard (A) attachments or enclosures.**
- b. Please see my response to CC/USPS-T1-8 subpart a.**
- c. Yes. This experiment does not propose to change the terms under which Standard Mail (A) attachment or enclosures can be mailed. The DMM provides only that the total weight of all enclosed Standard (A) matter must be less than 16 ounces (DMM C200.1.3a).**

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**CC/USPS-T1-24**

Library Reference CC-LR-2 in this Docket contains two exhibits, A and B. Exhibit A is a sealed plastic envelope/packet which has a height of 5 1/4 inches and length of 11 inches, weighs approximately 1.1 ounces, and contains skin care and lipstick samples. Exhibit B is identical to Exhibit A, except that the sealed packet has been opened to display the contents for inspection. A copy of Library Reference CC-LR-2 is being submitted to the Postal Service with these interrogatories.

- a. Under the Ride-Along experiment proposed in this Docket, could Exhibit A be mailed at the proposed 10-cent Ride-Along rate as a periodical insert or onsert? Unless your answer is an unqualified affirmative or negative – i.e., if “yes” under certain circumstances, but not others – please explain fully.
- b. If your answer is negative, please explain all reasons why Exhibit A would not qualify for the 10-cent Ride-Along rate.
- c. Unless your answer to subpart a above is an unqualified affirmative, please explain whether Exhibit A could be mailed as an onsert at the applicable Standard (A) rate of postage.

**RESPONSE**

- a. I would expect so, as long as the dimensions of the host piece are at least equal to or greater than the “Ride-Along” piece. This piece appears to meet the uniform thickness requirement.
- b. Not Applicable.
- c. Not applicable.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
INTERROGATORIES OF COX TARGET MEDIA INC. & COX CONSUMER SAMPLING**

**CC/USPS-T1-25**

- a. Under the proposed experiment, will the Ride-Along enclosure require an endorsement on it? If not, please explain fully why not.
- b. If an endorsement will be required,
  - (i) where would the endorsement be located?
  - (ii) what font size would be required for the endorsement?
  - (iii) what would be the method of payment (e.g. permanent imprint, precanceled or meter stamp)?
  - (iv) where would be the postage/imprint be placed?
- c. Will the periodical be required to indicate that it carries a Ride-Along enclosure? If so, what will be required?
- d. If definite answers to any question(s) in this interrogatory cannot be given (e.g., because DMM regulations are not yet drafted), please answer such question(s) based upon your opinion as to what type of DMM regulations would be desirable.

**RESPONSE**

- a. The final preparation standards for the "Ride-Along" rate have not yet been determined. However, we anticipate that an endorsement most likely will not be required on the "Ride-Along" itself.
- b. Not Applicable.
- c. The final preparation standards for the "Ride-Along" rate have not yet been determined. However, we anticipate requiring a marking such as "Ride-Along Enclosed" on or in the host publication on the cover, outer wrapper, polybag, envelope, or in the Identification Statement of the host publication. The size and placement of this marking would likely be similar to the requirements for placement of markings for First-Class or Standard Mail (A) enclosures as described in DMM C200.1.3d.
- d. Not Applicable.



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE TO  
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CC/USPS-T1-26

In your testimony, you refer to the proposed Ride-Along piece as an "enclosure" or "attachment."

- a. Please define "enclosure" and explain if "enclosure" is synonymous with "insert." If not, please describe any difference.
- b. Please define "attachment" and explain if "attachment" is synonymous with "onsert." If not, please describe any difference.

RESPONSE

- a. A permissible enclosure, synonymous with "insert", is one described in Domestic Mail Manual (DMM) C200.1.4. An impermissible enclosure, subject to Standard (A) rates, is generally considered anything loose or bound within the publication which is not described in C200.1.4; or , or anything enclosed loose with a publication under a wrapper which is not described in C200.1.4.
- b. A permissible attachment, synonymous with "onsert" is one described in C200.1.8. An impermissible attachment is generally considered anything attached to the front/cover page of a Periodicals publication which is not described in C200.1.8.

## DECLARATION

I, Altaf Taufique, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read 'Altaf Taufique', is written over a horizontal line.

Dated: NOVEMBER 30, 1999

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Scott L. Reiter

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November 30, 1999